

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

UNITED STATES OF AMERICA)
Plaintiff)
v.) No. 3:22-CR-024
VICTOR BTESH,) JUDGES CRYTZER/
MICHELLE'S DVD FUNHOUSE, INC.,) POPLIN
MJR PRIME, LLC,)
PRIME BROOKLYN, LLC) MOTION TO FILE UNDER SEAL
Defendants)

**MOTION OF DEFENDANT VICTOR BTESH
FOR LEAVE TO FILE SUPPLEMENTAL MATERIALS UNDER SEAL**

Come now Defendant, Victor Btesh, through undersigned counsel, pursuant to Rule 12.2 of the Electronic Case Filing Rules and Procedures of the United States District Court for the Eastern District of Tennessee, and moves for leave to have the proposed materials, associated with his Sentencing Memorandum, filed under seal due to the sensitive information contained therein, including but not limited to personal identifiable information, and identities of unindicted conspirators.

Undersigned counsel will provide copies to counsel for the Government and to the U.S. Probation Office.

Respectfully submitted this 18th day of August, 2023.

/s/ Donald A. Bosch
Donald A. Bosch (BPR No. 013168)
Ann C. Short (BPR No. 009645)

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Counsel for Victor Btesh

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 18, 2023, the foregoing was filed electronically, using the CM/ECF system, which will send a notice of electronic filing to all parties indicated on the electronic filing receipt.

/s/ Donald A. Bosch
DONALD A. BOSCH